



Global Nuclear Fuel

M200063

April 16, 2020

Matt Bartlett, Project Manager
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission

Attn: Document Control Desk

Subject: GNF-A Response to NRC Request for Additional Information

- References:
- 1) NRC License SNM-1097, Docket 70-1113
 - 2) Letter N. Ashkeboussi (NEI) to A. Szabo (NRC), "Industry Comments on the Information Collection for Domestic Licensing of Special Nuclear Material", 10/27/17
 - 3) GNF-A Request for Exemption from 24-Hour Reporting Requirement Requirement of 10 CFR 70.50(b)(1), 1/9/19
 - 4) E-Mail, M. Bartlett to S. P. Murray, "NRC Request for Additional Information", 3/17/20

Dear Mr. Bartlett

Attached is Global Nuclear Fuel – Americas, LLC (GNF-A) response with the additional information that you requested on March 17, 2020 (Reference 4). The attached GNF-A reporting resource estimates are consistent with those previously provided by the Nuclear Energy Institute (NEI) on behalf of its fuel cycle facility members (Reference 2).

If you have any questions concerning this information, please call me at (910) 819-5950.

Sincerely,


Scott Murray, Manager
Facility Licensing

Attachment: GNF-A Response to NRC Request for Additional Information

L. Pitts, USNRC RII
SPM 20-017

Global Nuclear Fuel

Scott P. Murray
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Attachment

GNF-A Response to NRC Request for Additional Information

The timely evaluation and initial event reports to the NRC Operations Center required by 10 CFR 70.50(b)(1) and follow-up written reports required by 10 CFR 70.50(c) is, rightly, a very serious issue and involves a significant amount of GNF-A staff time and resources. GNF-A typically commits at least 144 person-hours directly in generating the notification and follow-up reports. Included in these estimates are the time and resources required to:

- Evaluate an unplanned contamination event to determine reportability in a timely fashion per 10 CFR 70.50(b)(1) criteria. Based on the circumstances, this typically involves gathering a team of senior level managers and staff per the GNF-A notification and event classification procedure. If the event is determined to be reportable, the team develops, reviews and approves the initial 24-hour event report. GNF-A Facility Licensing personnel then notifies the NRC Operations Center, NRC Regional staff, State and Local authorities (24 person-hours, or approximately \$12,000 per event report).
- Perform additional detailed event investigations by Senior level managers and staff that would not otherwise occur had the event not been reported, corrective action program (CAP) management and reviews of each action in the CAP. In addition, operations, management, regulatory, legal and clerical support is needed to develop, review, approve and document the written 30-day follow-up report (120 person-hours or approximately \$54,700)

Unplanned contamination events are also routinely evaluated by GNF-A that may not meet 10 CFR 70.50(b)(1) report criteria. Based on the circumstances, this also typically involves gathering a team of senior level managers and staff per the GNF-A notification and event classification procedure. The frequency of these evaluations is estimated to be 4 times per year (20 person-hours each, 80 person hours per year, or approximately \$40,000 per year)

The total estimated cost per single event report is estimated at \$66,700, with an additional annual estimated expenditure of \$40,000 per year.

It should also be noted there are no similar NRC unplanned contamination event report requirements for approximately 96 operating nuclear power facilities, 20 power reactor facilities undergoing decommissioning, 31 research and test reactor facilities and 25 site specific and standalone independent spent fuel storage installations (ISFSIs). As a result, GNF-A believes granting an exemption request to a small number of facilities processing unirradiated uranium is consistent with NRC's principles of good regulation and is otherwise in the public interest because it provides clarity, reliability and regulatory reporting consistency to licensees with similar radiological contamination control programs.